

IN THE UNITED STATES
FEDERAL COURT FOR THE
MIDDLE DISTRICT
P.O. BOX 711

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RANDELL HAMPTON)
226420, Plaintiff)
etal vs. PROSE) CIVIL ACTION No #
Doctor Sediet etal) 2:06-CV-400-MHT
PMS, defendants)
etal Similar situation)
DEFENDANT)

Affidavit on Personal
Knowledge Pursuant Fed. Rule 56(e)

The Plaintiff, RANDELL HAMPTON IS OVER,
THE AGE OF TWENTY ONE, AND DOES HEREBY
MAKES THIS AFFIDAVIT ON PERSONAL KNOWLEDGE.

I.

The Plaintiff Alleged In His Medical
Lawsuit, That the Three defendants At
Bullock County Correctional Facility (ONE)
1) Denied HE, The Plaintiff, "Improper"
Medical Care, to Violate the CRIMINAL
COUNTER PART of 42 U.S.C. 1983 OF 18
U.S.C. 242 [1]

2) The Plaintiff contends what was done was done under, The Color of Law, and giving rise to a Colorable Claim, under Bivens vs Six Unknown Agents 403 U.S. At. 388 (Federal Rules Civil Procedure) Rule 56(c) At. 477 U.S. At 2510.

II.

3) The Plaintiff DOES SO Allege[ON] Personal knowledge, that the, similar Situated defendant, must have acted under the Color of Law, when they caused ... Inadequate medical care to occur At. 111 S.Ct. At 2326, and 2327 Wilson v. Seiter, giving rise to [A] ... Constitutional Amendment Eighth Claim under, Deliberate Indifferent Standard.

4) The Plaintiff Alleges, and REAlleges That the Defendants caused the ... deliberate indifference Claims to occur when they, Denied the Plaintiff or Plaintiff's of Improper medical care At. 429 U.S. At. 106, applying Deliberate Indifferent Standards re. to Improper or Inadequate medical care.

5) Rising to The Level
of Eighth Amendment Claims

III.

The Plaintiff contends, what was done, was done, to violate, 398 U.S. At 144 when the Defendants acted under the Color of Law, i.e. [to] violate Federal Statutes At 42 U.S.C. 1983 (1)(2)(3)(4)(5) of Pinkerston v. United States, 328 U.S. 640 (1946), where Each And Every member of [A] Conspiracy designed to deny any inmate, such as the Plaintiff of ~~proper~~ proper medical care, would further, violate Estelle vs. Gamble, 429 U.S. At 106, where the Court reads, The Complaint with The Personal Affidavits of Plaintiff on Personal Knowledge, (fRCP) Admissions Rule 36, and 56(e) on merits.

IV -

6) The Plaintiff complained that due to his medical condition i.e. [A] medical condition, that causes his muscles to lock up, causing the Plaintiff, to RE Hurt (Him self) For, 429 U.S. At 106.

V.

Punitive Damages
Proper 42 U.S.C. 30-75

- 1) The Plaintiff filed, His 42 USC. 1983 Lawsuit against the defendants for Denying (He The Plaintiff) of Proper medical care, and As Proper medical care was Denied, the same, Cause The Plaintiff Emotional distress, Having Been Put In [2] Situation, unable to do for Him Self At medical needs, where same denied
- (2) Denied improper medical care
- (3) Give Rise to the Defendants Being deliberate Indifferent, i.e. to the Plaintiff Medical Needs.
- (4) Did violate the Plaintiff Rights under Color of Law 398 U.S. 144
- (5) where Punitive damages Proper 42 USC. 1983 (1)(2)(3)(4)(5) Biden VS. Six unknown agents, At 403 U.S. At 388

8)

VI

DEMAND FOR CIVIL TRIAL
FED Rules of Civil Procedure
Rule 38, and 39(2)

The Plaintiff Request that the Court Deny ANY and ALL Defendants motion to Dismiss, ON The merits of Plaintiff Claims For The Purpose Anderson Vs. Libby Lobby, 477 U.S. At 2510, Showing His Genuine Issues For Civil Trial.

9) Herein Demanded, or In the Alternative, the Court Can order the Defendants i.e. to Pay Plaintiff (1 million Dollars) i.e. to Plaintiff, who HAS Suffered Irreparable Damages i.e. to His Emotions, By Being Denied Adequate medical Care, where Defendants, must HAVE Acted ...

- In Bad Faith, MANNER, to Cause
- * Obduracy to occur, when Read With 111 S.Ct. At 2326, at 2327
 - * Wilson V. GETER, 429 U.S. At 106, applying Deliberate Indifference i.e. to (all Prisoners) medical claims

***" []

VIIJurisdiction

10) This Court has Jurisdiction
i.e. to ENTERTAIN All Defendants
INCLUDING PRISONER COMMISSIONER
WHERE BY HE MAY HAVE FAILED
i.e. to Solve, State over crowding
Admitting He would Possible
ENJOY ANY Federal PRISON STAY.

(A) Where State Commissioner
HAS A DUTY OR POLICY
i.e. to see that All state
Prisoners, Receives, ANY
Proper medical care
due.

(B) Having Violated state
Policy, IN Failure to
Investigate ANY
deliberate Claims,
INVOLVING ANY DENIAL
of State Inmates i.e.
of Proper medical Care
did too, Cause the Commissioner i.e.
to BECOME LIBAL, 328 U.S. 640 (1946)
and Those That Follow, AS Defendants.

VIII.Immunity

- 11) wheather to say the defendants AS Commissioner IS Immune when Acting IN BAD FAITH MANNER I.e. to Deny (State inmates of ALABAMA) of Proper medical Care see MONELL VS NYCITY Social Services Supra

- 12) Punitive Damages Proper Fed RCP Rule 23(a) (FRCp) Rule 57

VIII.Jurisdiction II

- 13) This Court, HAS Jurisdiction to Hear State Medical Claims At. 12-11-30, Subsection (1975) of 28 U.S.C. 636, Invoked By Provision's 28 U.S.C. 1343 (2) Hagan v. Levine, 415 U.S. 528 (1967) BELL v. Hadd, United Mine Workers vs Gibbs Supra, Fed RCP Rule 23 (a) The Court HAS Jurisdiction At. 28 U.S.C. 1331, 1332 and 1391 OF 42 U.S.C. 1983, At Sullivan vs. Little Hunting Park, 28 U.S.C. 1981, where The Willful Discrimination, operated As Pattern of deliberate indifference for 18 USC 242

VIII.

14)

due to the widespread
Practice of the Named
Defendants, et al, Been-
ing in the Practice of willfully
Acting with Obduracy i.e.
to Violate United States, State's
Domestic Rights, under Color of
Situated Law, Fed 23 (2)

15)

the Plaintiff Request for Civil Sanctions
to BE Conferred upon, all defendants
from Widespread Practice of Being Both
Delibered Indifferent, to Proper ...
Medical Care, by Omission or acts
to Deny Same, under Color of Law,
Did Violate, 429 U.S. At. 106

I.Certificate of Service

ON BEHALF of The Class, Being so
Numerous, for Purpose Fed Rule 23(2)

I Randell Hampton 220420 did Notify
All defendants of The Action, By 23(2)
* Notice of Same in office of Clerk at
P.O. Box 711, United State Clerk's office
Montgomery AL 36130 - 8 -

Proof of Service

I, Randell Hampton #226420 did notify, all defendants of this Actions, and by Affidavits Attached to such ON PERSONAL knowledge, and Disposing same for 23(c) (frop)

In the United States Federal Court House for the Defendants to Pick up their Copy for approximate, 75 [A] Page.

III

the Class Being so Numerous (frop) Rule 23(c), whether Read with other Complaints, Similar Situated

Plaintiff:

By Randell Hampton #226420
Bullock Carcational Inc.
P.O. Box 567

Union Springs AL 36089

Legal Notice

Request for master

Frop Rule 53, for 23(c)

Notice 47 c/o Defendant Att, etal frop 23(c)